

# Exhibit “D”



# San Francisco Water Power Sewer

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February 4, 2019

Yilma Hailemichael  
Manager, Electric Transmission Contracts Management  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

Subject: Electrical Service for 4545 Anza Street – Lafayette Elementary  
School, NN#115322749 (Permanent Service)

Dear Mr. Hailemichael:

The City and County of San Francisco ("City"), acting by and through its Public Utilities Commission, is writing regarding the City's application submitted under the Pacific Gas & Electric Company ("PG&E") Wholesale Distribution Tariff ("WDT") for the Lafayette Elementary School at 4545 Anza Street, San Francisco. The City submitted a WDT application for a replacement of an existing secondary service for this site on November 7, 2018. A previous letter was sent to PG&E on December 11, 2018 regarding the WDT application for temporary service at the same address.

PG&E continues to deny the City's requests for secondary service. Many of these requests are for municipal public purpose loads such as the request here. The history and purpose of this location qualifies this site as grandfathered load. Pursuant to the Federal Power Act and the WDT, PG&E should provide service to the City's grandfathered loads without the need for intervening facilities.

Nevertheless, the City's WDT application for this project meets the intervening facilities requirements in Section 14.2.1 of the WDT. However, PG&E is still not approving the City's applications for secondary service. PG&E's requirement to take primary service at this location is not justified by any technical, safety, or reliability reasons. PG&E's unwillingness to serve the City's customers at secondary service is a denial of service.

Lafayette Elementary School was originally constructed in 1925 and has been serving the Outer Richmond community since. The purpose of the facility has remained the same since its opening. The City has provided electric service to the school since its opening. The school will be renovated as part of San Francisco Unified School District's ("SFUSD") modernization plan. Structural upgrades will be made to increase fire/life safety. As part of the renovation, the SFUSD needs to install new switchgear. The size of the existing switchgear is 800 amperes. The SFUSD has opted to install a 1600 amperes switchgear in order to allow for increased capacity at a later date. The size of the main breaker will remain at 800 amperes as the current requested load is 150 kW.

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Services of the San Francisco Public Utilities Commission

**OUR MISSION:** To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



On January 1, 2019 PG&E informed the SFPUC that, because of the new switchgear, the project would require a primary service level connection. The WDT provides no justification for such a requirement. For retail customers, PG&E only requires primary service for loads of at least 3MW, which is much larger than the 150 kW requested for the project at issue here. There are no technical, reliability or safety reasons to require primary service. The City continues to believe that under the WDT, secondary service is the appropriate service type for this point of delivery.

The City has inspected the site and determined there is insufficient space on the property to install primary switchgear. Schools are subject to various classroom and physical education space requirements enforced by the California Department of Education. Any remaining open space on or around the facility is necessary either to meet school building code standards or is designated recreational space for the students. In addition, placing primary switchgear in the available open areas would raise safety concerns as students will be using the adjacent space for physical education activities.

Due to the importance and urgency of the planned renovations to the school, the City proposes the configuration described below and as shown in the attached Figure 1. The City has agreed to install an interrupter. While we do not agree that an interrupter is necessary for intervening facility requirements under the WDT, the City is willing to install one only to move this project forward in timely manner.

**PG&E Owned:**

- Conductor from PG&E Service Point to Interrupter
- Secondary Meter

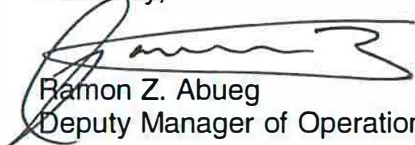
**City Owned:**

- Interrupter
- Conductor from Interrupter to Transformer
- Transformer
- Conductor from Transformer to Main Switchgear
- Switchgear
- Substructures

The City requests PG&E's cooperation to ensure timely completion of this important project.

If you have any questions concerning this letter, you can contact me at [rabueg@sfwater.org](mailto:rabueg@sfwater.org) or (415) 554-1541.

Sincerely,



Ramon Z. Abueg  
Deputy Manager of Operations, Power Enterprise

cc: John Klavdianos & Jason Shieh (PG&E)  
Becky Alderete & Chi lao (SFPUC)

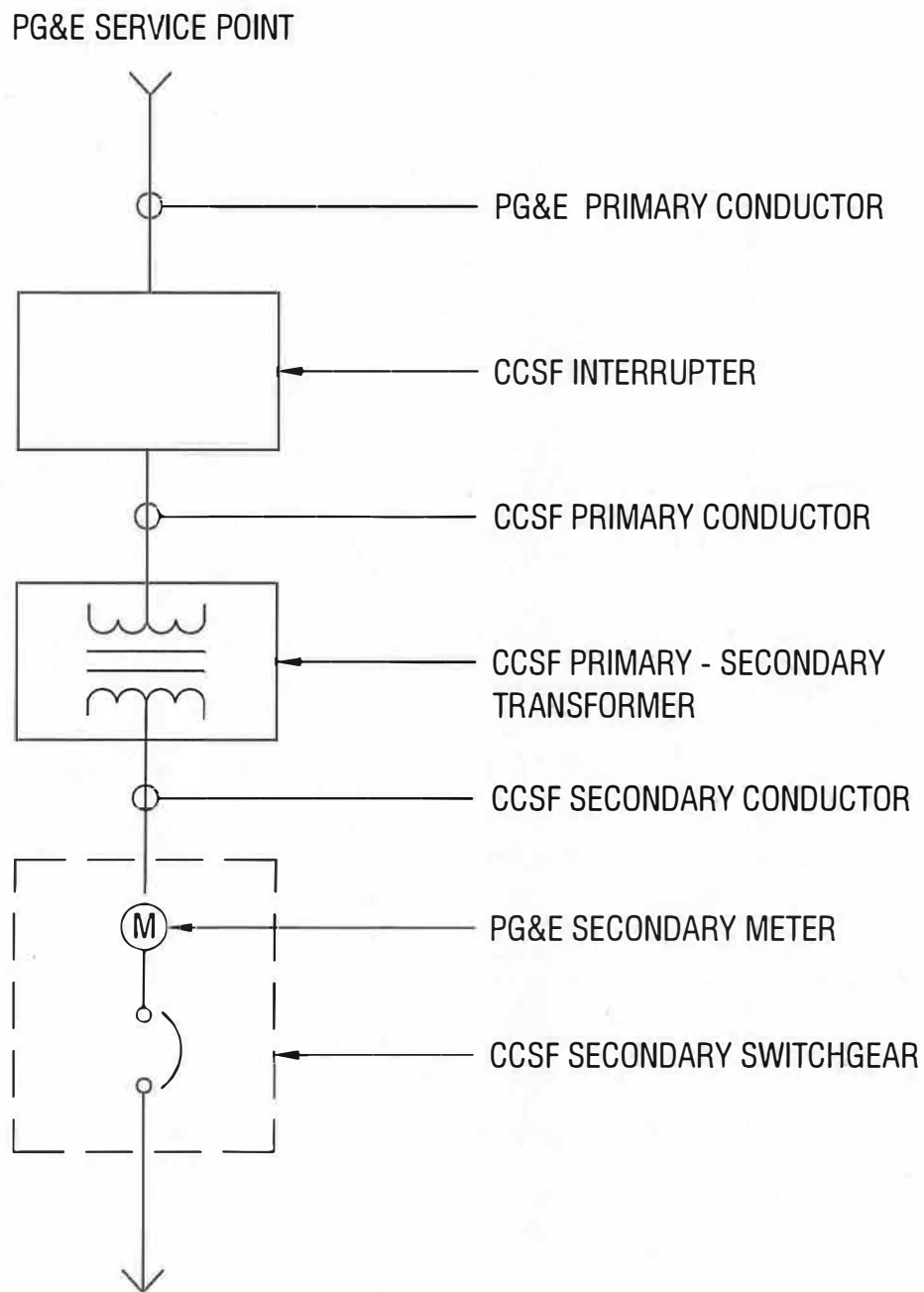


FIGURE 1 - PROPOSED SECONDARY METERING CONFIGURATION